

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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MICHELLE QUINN and PAUL QUINN,  
H/W,

Civil Action No. 10-04584

Plaintiffs,

Before the Honorable C. Darnell Jones, II

vs.

PAYPAL, INC., GE MONEY BANK,  
GENPACT SERVICES LLC and  
NATIONWIDE CREDIT, INC.,  
Defendants.

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**OFFER OF JUDGMENT PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 68**

TO: Plaintiffs, Michelle and Paul Quinn  
c/o Mitchell S. Clair, Esquire  
Law Offices of Mitchell Clair  
3038 Church Road  
Lafayette Hill, PA 19444

Pursuant to Federal Rule of Civil Procedure 68, Defendants, GE Money Bank and Genpact Services LLC (collectively, the "GE Defendants"), hereby offer to allow judgment to be entered against them and in favor of Plaintiffs, Michelle and Paul Quinn, h/w (collectively, the "Plaintiffs"), in the total amount of \$7,500.00 inclusive of statutory damages, actual damages, punitive damages and attorneys' fees and costs accrued through and including the date of service of this Offer of Judgment with respect to Plaintiffs' claims against the GE Defendants.

This Offer of Judgment is made solely for the purposes specified in Federal Rule of Civil Procedure 68, and is not to be construed as an admission that the GE Defendants are liable in this action or that Plaintiffs have suffered any damages as a result of any conduct by the GE Defendants.

Pursuant to Federal Rule of Civil Procedure 68, if Plaintiffs do not accept this Offer of Judgment within fourteen (14) days after service of this Offer, then the Offer shall be deemed withdrawn and evidence of this Offer will be inadmissible except in any proceeding to recover costs. Also, if Plaintiffs do not accept this Offer of Judgment, and the judgment obtained by Plaintiffs is not more favorable than this Offer, then the Plaintiffs must pay all costs incurred by the GE Defendants after this Offer of Judgment was made.

ACCEPTED: \_\_\_\_\_  
Michelle Quinn

DATE: \_\_\_\_\_

ACCEPTED: \_\_\_\_\_  
Paul Quinn

DATE: \_\_\_\_\_

Respectfully submitted,

FOX ROTHSCHILD LLP



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Attorneys for Defendants,  
GEMB Money Bank and Genpact Services LLC

Dated: July 13, 2011